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Attorneys for Defendants KIM HADDAD, KKH INC., SPIKE REAL ESTATE, LLC
(erroneously sued herein as SPIKE REAL STATE)

THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
DIVISION OF SAN FRANCISCO

TAMARA DOUKAS, an individual,) No. CV-02336-SI

Plaintiff,)

v.)

COUNTY OF SAN MATEO, a public)
entity, PENINSULA HUMANE)
SOCIETY, a private non-profit)
organization, DEBI DENARDI, an)
individual, KIM HADDAD, an individual,)
KKH INC., a private entity, SPIKE REAL)
ESTATE, LLC, a private entity, and DOES)
1 through 50, inclusive,)

Defendants.)

**DECLARATION OF PETER J. VAN
ZANDT IN SUPPORT OF DEFENDANTS
DR. KIM HADDAD, KKH, INC. AND
SPIKE REAL ESTATE'S RESPONSE TO
PLAINTIFF'S OPENING BRIEF RE
JURISDICTION**

Date: October 3, 2008

Time: 9:00 am

Judge: Hon. Susan Illston

Complaint Filed: May 6, 2008

I, Peter J. Van Zandt, declare:

1. I am an attorney duly licensed to practice law before all courts in the State of California, and am a partner in the law firm of Bledsoe, Cathcart, Diestel, Pederson & Treppa, LLP, attorneys of record herein for defendant KIM HADDAD ("Defendant"), in the above-referenced action.

2. I have personal knowledge of all facts stated herein, and if called as a witness could and would competently testify to them under oath.

3. Attached hereto as Exhibit A is a true and correct copy of plaintiff TAMARA DOUKAS' Statement of Damages.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct

Executed this 11th day of September, 2008 at San Francisco, California.

Peter J. Van Zandt

EXHIBIT A

014
2/21/07

STATE FARM CDAVIS

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03/06 '07 09:52, NO. 156 02/09

CIV-050

- DO NOT FILE WITH THE COURT -
- UNLESS YOU ARE APPLYING FOR A DEFAULT JUDGMENT UNDER CODE OF CIVIL PROCEDURE § 585 -

| | | |
|---|--------------------------------|------------------------------------|
| ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): MARK L. WEBB (SBN 067959) LAW OFFICES OF MARK L. WEBB 414 COUGH ST., #2 SAN FRANCISCO, CA 94102 | TELEPHONE NO.: 415-621-4500 | FOR COURT USE ONLY |
| ATTORNEY FOR (name): PLAINTIFF: SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 COUNTY CENTER MAILING ADDRESS: 400 COUNTY CENTER CITY AND ZIP CODE: REDWOOD CITY, CA 94063 BRANCH NAME: SAN MATEO | | |
| PLAINTIFF: TAMARA DOUKAS DEFENDANT: COUNTY OF SAN MATEO, et al. | | |
| STATEMENT OF DAMAGES (Personal Injury or Wrongful Death) | | CASE NUMBER: CIV 46 1009 |

To (name of one defendant only): KIM HADDAD
 Plaintiff (name of one plaintiff only): TAMARA DOUKAS
 seeks damages in the above-entitled action, as follows:

1. General damages

| a. <input checked="" type="checkbox"/> Pain, suffering, and inconvenience | AMOUNT \$ 250,000 |
|---|----------------------|
| b. <input checked="" type="checkbox"/> Emotional distress | \$ 250,000 |
| c. <input type="checkbox"/> Loss of consortium | \$ |
| d. <input type="checkbox"/> Loss of society and companionship (wrongful death actions only) | \$ |
| e. <input type="checkbox"/> Other (specify) | \$ |
| f. <input checked="" type="checkbox"/> Other (specify) | \$ |
| g. <input type="checkbox"/> Continued on Attachment 1.g. | \$ |
2. Special damages

| a. <input type="checkbox"/> Medical expenses (to date) | \$ |
|--|----------|
| b. <input type="checkbox"/> Future medical expenses (present value) | \$ |
| c. <input type="checkbox"/> Loss of earnings (to date) | \$ |
| d. <input type="checkbox"/> Loss of future earning capacity (present value) | \$ |
| e. <input checked="" type="checkbox"/> Property damage | \$ 1,000 |
| f. <input checked="" type="checkbox"/> Funeral expenses (wrongful death actions only) | \$ |
| g. <input type="checkbox"/> Future contributions (present value) (wrongful death actions only) | \$ |
| h. <input type="checkbox"/> Value of personal service, advice, or training (wrongful death actions only) | \$ |
| i. <input type="checkbox"/> Other (specify) | \$ |
| j. <input type="checkbox"/> Other (specify) | \$ |
| k. <input type="checkbox"/> Continued on Attachment 2.k. | \$ |
3. Punitive damages: Plaintiff reserves the right to seek punitive damages in the amount of (specify). \$ _____

Date: FEBRUARY 21, 2006

MARK L. WEBB (SBN 067959)
(TYPE OR PRINT NAME)

(SIGNATURE OF PLAINTIFF OR ATTORNEY FOR PLAINTIFF)

(Proof of service on reverse)

STATEMENT OF DAMAGES
(Personal Injury or Wrongful Death)Legal
Solutions
& Plus